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Counsel for Defendant Mullen Automotive,  
Inc. f/k/a Net Element, Inc.

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

JENNIFER MALONEY, Individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

MULLEN AUTOMOTIVE, INC. F/K/A NET  
ELEMENT, INC., DAVID MICHERY, and  
JONATHAN NEW,

Defendants.

**Case No. 2:25-cv-01187-MCS-JDE**

**Stipulation to Extend Time to Respond to  
Initial Complaint**

IT IS HEREBY STIPULATED by and between the parties, Plaintiff Jennifer Maloney ("Plaintiff") and Defendant Mullen Automotive, Inc. f/k/a Net Element, Inc. ("Defendant"), through their respective attorneys of record, as follows:

WHEREAS, Plaintiff filed her Complaint on February 12, 2025;

WHEREAS, Plaintiff served the Summons and Complaint on Defendant on February 13, 2025;

WHEREAS, Defendant desires additional time to prepare and file a response;

WHEREAS, Plaintiff is willing to provide additional time for Defendant to prepare and file its response.

1 NOW, THEREFORE, BASED ON THE FOREGOING FACTS, THE PARTIES  
2 HEREBY STIPULATE THAT:

3 1. Defendant's last day to file its response to the Complaint on file in this matter is  
4 extended from March 6, 2025, to thirty-five days after this Court enters an order appointing lead  
5 plaintiff and lead counsel in accordance with 15 U.S.C. § 77z-1 and 15 U.S.C. § 78u-4.

6 IT IS SO STIPULATED AND AGREED.

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8 Dated: March 11, 2025

**MILTNER & MENCK, APC**

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10 By: /s/ William Miltner  
11 William L. Miltner, Esq.  
12 Ashlin B. Steele, Esq.  
13 MILTNER & MENCK APC  
14 Attorneys for Defendant Mullen Automotive,  
Inc. f/k/a Net Element, Inc.

15 Dated: March 11, 2025

**CLAYEO C. ARNOLD**  
**A PROFESSIONAL CORPORATION**

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17  
18 By: /s/ M. Anderson Berry  
19 M. Anderson Berry  
20 Gregory Haroutunian  
21 Brandon P. Jack  
22 Counsel for Plaintiff and the Proposed Class  
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